

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
SOUTHERN DIVISION**

SEVEN ANDERSON,	)	
	)	
Plaintiff,	)	
	)	No. 8:12-cv-2255
v.	)	
	)	
LIGHTHOUSE RECOVERY	)	
ASSOCIATES, LLC.	)	
	)	
Defendant.	)	

**PLAINTIFFS' VERIFIED COMPLAINT**

SEVEN ANDERSON (Plaintiff), through attorney Frederick E. Nix, allege the following against LIGHTHOUSE RECOVERY ASSOCIATES, LLC. (Defendant):

**INTRODUCTION**

1. Count I of Plaintiff's Complaint is based on the Fair Debt Collection Practices Act, 15 U.S.C. 1692 et seq. (FDCPA).

**JURISDICTION AND VENUE**

2. Jurisdiction of this Court arises pursuant to 15 U.S.C. 1692k(d), which states that such actions may be brought and heard before "any appropriate United States district court without regard to the amount in controversy."
3. Defendant conducts business in the state of Maryland; therefore, personal jurisdiction is established.
4. Venue is proper pursuant to 28 U.S.C. 1391(b)(2).

## **PARTIES**

5. Plaintiff is a natural person residing in Mount Airy, Maryland.
6. Plaintiff is a consumer as that term is defined by 15 U.S.C. 1692a(3), and according to Defendant, Plaintiff allegedly owes a debt as that term is defined by 15 U.S.C. 1692a(5).
7. Defendant is a debt collector as that term is defined by 15 U.S.C. 1692a(6), and sought to collect a consumer debt from Plaintiff.
8. Plaintiff is informed and believe, and thereon alleges, that Defendant is a debt collection company with an office in Centennial, Ohio.
9. Defendant acted through its agents, employees, officers, members, directors, heirs, successors, assigns, principals, trustees, sureties, subrogees, representatives, and insurers.

## **FACTUAL ALLEGATIONS**

10. In June 2012, Defendant placed collection calls to Plaintiff seeking and demanding payment for a debt.
11. Plaintiff's alleged debt owed arises from transactions for personal, family, and household purposes.
12. In June of 2012, Defendant called Plaintiff and left a voicemail message on his answering machine. *See* Exhibit A.
13. In the voicemail message, Defendant's representative, failed to meaningfully disclose the company's name or the nature of the call or state that the call was from a debt collector. *Id.*
14. In the voicemail message, Defendant's representative, directed Plaintiff to call him back at 1-720-282-5027, which is a number that belongs to Defendant. *Id.*
15. Defendant called Plaintiff's telephone number at XXX-XXX-6944.

**COUNT I**  
**DEFENDANT VIOLATED THE FAIR DEBT**  
**COLLECTION PRACTICES ACT**

16. Defendant violated the FDCPA based on, but not limited to, the following:
- a. Defendant violated § 1692e of the FDCPA through the use of false, deceptive, or misleading representation or means in connection with the collection of any debt;
  - b. Defendant violated § 1692e(11) of the FDCPA by failing to disclose that the call was from a debt collector.

WHEREFORE, Plaintiff, SEVEN ANDERSON, respectfully requests judgment be entered against Defendant, LIGHTHOUSE RECOVERY ASSOCIATES, LLC. for the following:

- 17. Statutory damages of \$1000.00 pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. 1692k;
- 18. Costs and reasonable attorneys' fees pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. 1692k; and
- 19. Any other relief that this Court deems just and appropriate..

RESPECTFULLY SUBMITTED,

By: /s/ Frederick E. Nix  
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